

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

RANDY RAKES,  
*Plaintiff,*

v.

PROLLENium US, INC. and PROLLENium  
MEDICAL TECHNOLOGIES, INC.,  
*Defendants.*

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Case No. 4:19-cv-03401

**DEFENDANTS' MOTION TO APPEAR BY TELEPHONE  
FOR INITIAL CONFERENCE**

The Court has scheduled an Initial Conference for December 18, 2019 at 10:30 a.m. Counsel for Defendants, who resides with his family in Austin, Texas, has a son who is in an elementary school performance scheduled for 8:00 a.m. the morning of the hearing. As he would very much like to attend this performance and build up fatherly goodwill, Defendants' counsel respectfully requests permission to appear at and participate in the Initial Conference by telephone.

Respectfully submitted,

/s/ Jeffrey J. Hobbs

**JEFFREY J. HOBBS**

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was delivered via email to the following counsel of record on this the 12<sup>th</sup> day of December, 2019:

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/s/ Jeff Hobbs  
JEFF HOBBS